



Manuel A. Gurdian
Attorney
Legal Department

AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

T: (305) 347-5561
F: (305) 577-4491
manuel.gurdian@att.com

November 16, 2007

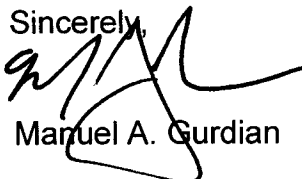
Ms. Ann Cole
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: New Docket: _____
In Re: Joint Petition of SBC Long Distance, LLC d/b/a AT&T Long Distance, LLC, TCG South Florida, and BellSouth Telecommunications, Inc. d/b/a AT&T Florida For Waiver of Rule 25-24.118, F.A.C. and Request for Expedited Treatment

Dear Ms. Cole:

Enclosed is the Joint Petition of SBC Long Distance, LLC d/b/a AT&T Long Distance, LLC, TCG South Florida and BellSouth Telecommunications, Inc. d/b/a AT&T Florida for Waiver of Rule 25-4-118, Florida Administrative Code, which we ask that you file in the captioned *new* docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Manuel A. Gurdian

cc: All Parties of Record
Jerry Hendrix
Lisa S. Foshee
E. Earl Edenfield, Jr.

CERTIFICATE OF SERVICE

In Re: Joint Petition of SBC Long Distance, LLC d/b/a AT&T Long Distance, LLC, TCG South Florida, and BellSouth Telecommunications, Inc. d/b/a AT&T Florida For Waiver of Rule 25-24.118, F.A.C. and Request for Expedited Treatment

I HEREBY CERTIFY that a true and correct copy was served via Electronic Mail and First Class U. S. Mail this 16th day of November, 2007 to the following:

Patrick K. Wiggins, Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6212
pwiggins@psc.state.fl.us



Manuel A. Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Joint Petition of SBC Long Distance, LLC) Docket No.:
d/b/a AT&T Long Distance, LLC, TCG South)
Florida, and BellSouth Telecommunications,))
Inc. d/b/a AT&T Florida For Waiver)
of Rule 25-24.118, F.A.C. and Request for)
Expedited Treatment) Filed: November 16, 2007
_____)

JOINT PETITION OF SBC LONG DISTANCE, LLC d/b/a AT&T LONG DISTANCE, LLC, TCG SOUTH FLORIDA AND BELLSOUTH TELECOMMUNICATIONS, INC. d/b/a AT&T FLORIDA FOR WAIVER OF RULE 25-4-118, FLORIDA ADMINISTRATIVE CODE

SBC Long Distance d/b/a AT&T Long Distance (“AT&T-LD”), TCG South Florida (“TCG-SFL”), and BellSouth Telecommunications, Inc. d/b/a AT&T Florida (“AT&T Florida”) (jointly the “AT&T Companies”), pursuant to Rule 28-104.002, Florida Administrative Code, respectfully submit this Joint Petition for Waiver of the subscriber carrier selection and verification requirements contained in Rule 25.4-118, Florida Administrative Code and advise the Commission of its plans regarding certain current local business customers of AT&T-LD. In support thereof, Petitioners state the following:

1. Name and addresses of Petitioners are:

SBC Long Distance LLC d/b/a AT&T Long Distance
1010 North St. Mary’s
Room 1335
San Antonio, TX 78215
Telephone Number: (210) 246-8757

TCG South Florida
150 South Monroe Street
Suite 400
Tallahassee, FL 32301
Telephone Number: (850) 222-1201

BellSouth Telecommunications, Inc. d/b/a AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, FL 32301
Telephone Number: (850) 222-1201

2. All pleadings, notices and other documents directed to AT&T in this proceeding should be provided to:

E. Earl Edenfield, Jr.
Tracy W. Hatch
Manuel A. Gurdian
c/o Gregory Follensbee
150 South Monroe Street, Ste. 400
Tallahassee, FL 32301
ke2722@att.com
305.347.5558 (telephone)
850.222.8640 (fax)

David M. Eppsteiner
Lisa S. Foshee
AT&T Southeast
675 West Peachtree Street,
Suite 4300
Atlanta, GA 30375
lisa.foshee@att.com
404.335.0750 (telephone)

3. AT&T-LD, AT&T Florida, and TCG-SFL are authorized to provide local services to business customers in Florida. AT&T-LD, TCG-SFL, and AT&T Florida are in the process of integrating and streamlining certain business operations to make the operations of each company more efficient. In conjunction with these efforts, AT&T-LD will cease providing business local exchange service to its current customers in AT&T Florida service territory. AT&T-LD is also discontinuing the provision of business local exchange service in Florida outside of AT&T Florida's service territory.

4. To efficiently exit the business local exchange service market in Florida, AT&T-LD has divided its Florida customers into two groups based upon the services the

customers receive from AT&T-LD. The first group, for which the waiver is being requested, is for POTS-only local customers. AT&T-LD will migrate its single line analog business local customers to local service provided by AT&T Florida in AT&T Florida's service territory and to AT&T's other affiliate, TCG-SFL for those customers in Florida but outside of AT&T Florida's service territory. The migration will only be for those customers that do not voluntarily select a new service provider or choose an AT&T Florida or TCG-SFL local service plan prior to the established period for the migration. There are approximately 54 customers in this group in Florida. Through this service migration, AT&T seeks to bring to its customers the best of AT&T's integrated services and to further the integration efforts of the new AT&T by simplifying its service portfolio and streamlining its operations to help improve customer service.

5. The second group of local business exchange service customers, for which notice¹ is being provided (and for which no waiver is requested or required), 1) consists of customers who receive more complex services from AT&T-LD or 2) those customers who receive local services where there is no AT&T affiliate available for migration purposes. The customers who receive more complex services include customers who receive either digital services or a combination of both digital and POTS-only services. For the customers who receive complex services and those customers who receive services where there is no AT&T affiliate available for migration purposes, migration is not a practical alternative. Accordingly, AT&T-LD will cease providing service to these customers only after they have been provided two notices and given adequate opportunity to select a different carrier. There are approximately 61 customers in this group in Florida.

¹ Customers will be provided at least thirty (30) days written notice of AT&T-LD's plan to cease providing local service and will be told that they must affirmatively choose another local service provider to avoid losing their local telephone service. Customers who do not select a local service provider by the deadline included in the customer notice will receive a second notice at least fifteen (15) calendar days prior to service discontinuance.

REQUEST FOR WAIVER

6. The rule for which the AT&T Companies require a waiver is Rule 25-4.118, Florida Administrative Code, "Local, Local Toll or Toll Provider Selection." Rule 25-4.118(1) provides, *inter alia*, that the "[local, local toll or toll] provider of a customer shall not be changed without the customer's authorization." In addition, this Rule provides the requirements with which a carrier must comply to change the local, local toll or toll service provider of a customer. In the instant case, the AT&T Companies desire a waiver of the carrier selection requirements of Rule 25-4.118 to the extent that certain customers' local service is migrated from ATT-LD to AT&T Florida or TCG-SFL without such customers' affirmative selection. This waiver is necessary in order to maintain continuity of local service for these customers.

7. While the AT&T Companies clearly desire that the affected customers will choose to continue receiving service from an AT&T entity, AT&T-LD recognizes that each of these customers has a right to choose his or her own service provider. AT&T-LD will respect that right throughout the planned transition by giving customers ample notice and time to select another provider. Notwithstanding, the AT&T Companies also anticipate that some customers will not affirmatively choose service either from AT&T Florida, TCG-SFL or another local service provider. In order for these customers to retain local service, AT&T will migrate these customers to comparable AT&T Florida or TCG-SFL local services.² It is this last group of customers which necessitates the instant request for waiver of the carrier selection requirements in Rule 25-4-118, Florida Administrative Code.

² The customers migrated to AT&T Florida, pursuant to a planned promotion, will receive a 15% discount on the tariffed rate for their service for twelve (12) months after transfer.

8. In conjunction with the exit of AT&T-LD from the business local service market, AT&T-LD will send letters to affected customers notifying these customers of the discontinuance of service. A copy of AT&T's Customer Notice Letter (with attachments) is attached hereto as Exhibit A.

9. Recognizing customers' right to choose a local service provider, AT&T-LD will provide the following options, each of which is described in the Customer Notice Letter:

a) Customers can call AT&T Florida or TCG-SFL to select a new AT&T Florida or TCG-SFL local service plan, as applicable. As a result of this migration, there will be no cost associated with a customer's transferring his or her local service provider to AT&T Florida or TCG-SFL.

b) Customers can select another local service provider. Customers will specifically be notified that they need to make this selection within approximately 60 days of the date of the Customer Notice Letter to avoid being automatically migrated to AT&T Florida or TCG-SFL.

c) Customers who do not choose a new AT&T Florida local rate plan or a new provider will be automatically migrated to AT&T Florida or TCG-SFL, as applicable, subject to regulatory approval, during a transition period from February 1, 2008 to April 30, 2008. Such customers will be given an AT&T Florida or TCG-SFL local service plan, as applicable, that is most comparable to the customer's current telephone service plan. There will be no cost to the customer for this transfer to AT&T Florida or TCG-SFL.

10. The AT&T Companies expect that most AT&T-LD customers wishing to migrate their local service to AT&T Florida or TCG-SFL will contact AT&T Florida or TCG-SFL directly to effectuate the service provider change as provided in the Customer Notice

Letter. For customers who call to make the service provider change to AT&T Florida or TCG-SFL, the companies will follow the carrier selection process in Rule 25-4.118.

11. This automatic migration is necessary to provide continuity of service when AT&T-LD ceases providing local business exchange service to its POTS-only business customers. Further, AT&T-LD believes a waiver/variance of Rule 25-4.118 is necessary in the event a customer fails to respond to AT&T-LD's direction to affirmatively choose a replacement so that a disruption of the customer's business activity does not occur. Many such customers may see themselves as "choosing" automatic migration by electing not to respond. For these customers, it is likely that they would prefer not to be bothered by an uninvited call seeking to obtain third-party verification. The AT&T Companies would also note that, even after such an automatic migration is completed, the customer, as always, will continue to have the right to change service providers if he or she later chooses to do so.

12. The Commission has routinely granted waiver requests similar to the instant petition. (*See e.g.*, Orders Nos. PSC-07-0624-PAA-TP, PSC-07-0704-CO-TP; 07-0361-PAA-TP; 07-0209-PAA-TP; 07-0133-PAA-TP; 06-0734-PAA-TP)

13. Based on AT&T-LD's decision to cease providing business local service and the need to ensure that customers not affirmatively selecting a local service provider continue to be provided with local service, a waiver of the carrier selection requirements in Rule 25-4.118 is appropriate and in the public interest.

CONCLUSION

AT&T-LD has developed a service discontinuance plan for its current business local service customers in Florida. This plan ensures clear and concise advance written notifications to its business local service customers, the opportunity for affected end-user

customers to choose local exchange service from any available local exchange carrier prior to migration or service discontinuance, and toll-free communications channels for affected customers to contact for information. Additionally, the AT&T Companies have established an internal management team of seasoned telecommunications professionals to coordinate, manage, monitor, and trouble shoot the plan.

WHEREFORE, based upon the foregoing, AT&T-LD, TCG-SFL and AT&T Florida respectfully request that a waiver of the carrier selection requirements be granted for the migration of business local service customers from AT&T-LD to AT&T Florida or TCG-SFL, as described herein.

Respectfully submitted this 16th day of November, 2007.

BellSouth Telecommunications, Inc. d/b/a
AT&T FLORIDA; SBC Long Distance LLC d/b/a
AT&T Long Distance, LLC; and TCG South Florida



E. Earl Edenfield Jr.
Tracy W. Hatch
Manuel A. Gurdian
c/o Greg Follensbee
150 South Monroe Street, Ste. 400
Tallahassee, FL 32301
(305) 347-5558



David M. Eppsteiner
Lisa S. Foshee
AT&T Southeast
675 West Peachtree Street, Suite 4300
Atlanta, Georgia
(404) 335-0750

Migration letter for Telecom Business Customers FL

SBC Long Distance, LLC
d/b/a AT&T Long Distance
1010 St. Mary's St. # 13L
San Antonio, TX 78215-2109

Date

Important Notice: Change in your Local Telephone Service

Dear Valued Business Customer:

AT&T values your business, and we'd like to update you on some important changes underway. As you may know, in December 2006 AT&T Inc., and its subsidiary, SBC Long Distance, LLC dba AT&T Long Distance joined BellSouth to form the new AT&T. Part of the integration process includes the affiliated companies streamlining their business service portfolios. *As a result of this integration, your local service, which is currently provided by AT&T Long Distance (formerly SBC Long Distance), will now be provided by AT&T Florida (or TCG South Florida) in certain areas.*

Unless you choose another local service provider, and subject to regulatory approval, your local service will be automatically transferred to AT&T Florida (or TCG South Florida in certain areas) no sooner than February 1, 2008. If you choose to remain with AT&T, then no action on your part is required. Again, subject to regulatory approval, the transfer of your service to an AT&T affiliate will be automatic, and will take place during a transition period from February 1, 2008 through April 30, 2008. There is no cost to you for the transfer. You will be placed on an AT&T affiliate's local service plan that is comparable to your current local service plan. Your total monthly recurring charges also will be comparable.

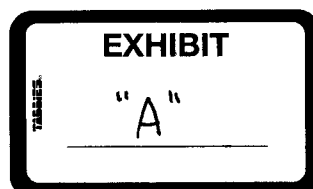
Again, you have the right to select another local telephone service provider. However, you are a valued customer and we sincerely hope you will continue to remain with AT&T. If you select another provider, that carrier will be able to provide you with a list of their services and charges. A listing of available local service providers may be found in your AT&T White Pages Directory.

If you select a new local service provider, you should contact your current long distance provider to ensure there is no change to your long distance calling plan. Not doing so may result in a change in the rates applied to your long distance calls.

For questions about your new service, this transition, or how you can take advantage of AT&T's new suite of products and services, we invite you to contact your account representative or AT&T Florida toll free at 1-800-258-0241 (8am – 5pm Monday-Friday).

Sincerely

Your AT&T Business Specialist



Rate Terms and Conditions of Local Service

AT&T offers local service to Business customers in authorized service areas. All rates are subject to change. You will be notified in writing of any future rates, terms or condition changes to your new account.

Transition Process

As part of this transition the following will occur.

1. Your current business access lines will be converted to the most comparable plan described below.
2. Each Feature on each of your line(s) will be converted to the most comparable feature in the AT&T Florida plan.
3. Frozen or blocked accounts will be transferred automatically to AT&T unless an alternate local provider selection is made. Contact AT&T toll free at 1-800-258-0241 if you would like to re-establish a freeze/block for your account after the transition period.

Local Service Plans and Rates:

SBCLD Local Product	Monthly Rate-Per Line	Comparable AT&T Florida Service	Monthly Rate-Per Line prior to Discount	Discount
Phone Solutions for Business	\$41.60 to \$48.00	Complete Choice for Business (one line package rate)	\$52.00	15% 12 months
Basic Business Lines	\$21.70 to \$28.50	Business Lines (multi-line exchange rate)	\$27.95 to \$40.00	15% 12 months

Rates do not include taxes; surcharges, municipal fees or FCC approved line charge.

SBCLD Phone Solutions has the following available features:

Auto Redial, Call Waiting/Cancel Call Waiting , Call Blocker, Call Waiting ID, Call Forwarding, Caller ID, Name and Number, Call Forward/Busy Line-Don't Answer, Local Usage (Business),Call Forwarding-Selective, Message Waiting Indicator, Call Return2 Priority Call, Call Trace Three-Way Calling

SBCLD Phone Solutions has the following available optional features:

Anonymous Call Rejection, Circular Hunting, Auto Redial, Message Waiting Indicator, Call Forward/Busy Line- Don't Answer, Priority Call, Call Forwarding, Remote Access to Call Frwdg., Call Forwarding-Selective, Series Completion Hunting, Call Forwarding-Simultaneous, Speed Calling 8, Call Waiting ID, Toll Restriction, Call Blocker, Three-Way Calling, Call Waiting, Call Return, Caller ID Name and Number, International Call Blocking, Call Forwarding-Busy Line, Call Frwdg-Don't Answer

Complete Choice for Business has the following available features:

Touchtone, Call Forward Busy Line, Call Forward Don't Answer, Call Forward Don't Answer Ring Control, Call Forward Variable, Call Waiting, Speed Calling 8, Speed Calling 30, Three Way Calling, Message Waiting Indicator – Audible, Message Waiting Indicator – Visual, Call Return, Call Block, Call Tracing, Repeat Dialing, Call Selector, Preferred Call Forwarding, RingMaster I , RingMaster II, Remote Access Call Forwarding, Three Way Calling with Transfer, Caller ID Number Delivery, Caller ID Number Delivery with Anonymous Call Rejection, Enhanced Caller ID with Call Disposition with Anonymous Call Rejection, Enhanced Caller ID with Anonymous Call Rejection, Caller ID Name and Number Delivery, Caller ID Name and Number Delivery with Anonymous Call Rejection, Additional Listing, Foreign Listing, Surrogate Client Number, Hunting/Grouping ** Available with 3 or more Line Packages only*** , Star 98

Rate Terms and Conditions of Local Service

AT&T offers local service to Business customers in authorized service areas. All rates are subject to change. You will be notified in writing of any future rates, terms or condition changes to your new account.¹

Transition Process

As part of this transition the following will occur.

1. Your current business access lines will be converted to the most comparable plan described below.
2. Each Feature on each of your line(s) will be converted to the most comparable feature in the AT&T plan. Charges for all features converted will be zero rated (no charge)
3. Frozen or blocked accounts will be transferred automatically to AT&T unless an alternate local provider selection is made. Contact AT&T toll free at 1-800-258-0241 if you would like to re-establish a freeze/block for your account after the transition period.

Local Service Plans and Rates:

SBCLD Local Product	Monthly Rate-Per Line	Similar TCG Service	Monthly Rate-Per Line
Phone Solutions for Business	\$41.60 to \$48.00	All in One Plan K	\$30.95

Rates do not include taxes; surcharges, municipal fees or FCC approved line charge.

SBCLD Phone Solutions for business has the following available features:

Auto Redial, Call Waiting/Cancel Call Waiting , Call Blocker, Call Waiting ID, Call Forwarding, Caller ID, Name and Number, Call Forward/Busy Line-Don't Answer, Local Usage (Business), Call Forwarding-Selective, Message Waiting Indicator, Call Return Priority Call, Call Trace Three-Way Calling

SBCLD Phone Solutions for business has the following available optional features:

Anonymous Call Rejection, Circular Hunting, Auto Redial, Message Waiting Indicator, Call Forward/Busy Line- Don't Answer, Priority Call, Call Forwarding, Remote Access to Call Frwdg., Call Forwarding-Selective, Series Completion Hunting, Call Forwarding-Simultaneous, Speed Calling 8, Call Waiting ID, Toll Restriction, Call Blocker, Three-Way Calling, Call Waiting, Call Return, Caller ID Name and Number, International Call Blocking, Call Forwarding-Busy Line, Call Frwdg-Don't Answer

AT&T All in One has the following available features:

Call Forwarding Busy, Call Forwarding No Answer, Call Forwarding Remote Access, Call Forwarding Variable, Caller ID, Caller ID with Name, Caller ID Blocking-Per Line, Caller ID with Call Waiting (# only), Caller ID with Call Waiting (Name/#), Call Transfer, Call Waiting, Distinctive Ring Service, Hunting for lines-Normal, Inside Wiring Maintenance Plan, Remote Call Forwarding, Selective Call Rejection, Speed Dialing-8, Speed Dialing-30, Three Way Calling, Touch Tone.

¹ Service will be provided by an AT&T affiliate, TCG South Florida.